

Attachment A-3

Verification of Energy Delivery for Out-of-State Facilities for 2008-2010

The *Renewables Portfolio Standard (RPS) Eligibility Guidebook, Third Edition* (p.49) explains how staff intends to verify energy delivery and the required information for this purpose. The *RPS Eligibility Guidebook, Fourth Edition* provides the CEC-RPS-Delivery form for reporting energy delivery information for facilities located outside-of-state Western Renewable Energy Generation Information System (WREGIS) (refer to *RPS Eligibility Guidebook, Appendix B*).

Retail sellers claiming procurement from out-of-state facilities as RPS-eligible for years 2008 to 2010 must demonstrate that such procurement complies with requirements specified in the *RPS Eligibility Guidebook, Third and Fourth editions*; that a matching quantity of electricity must be delivered to an in-state point of delivery in a manner consistent with North American Electrical Reliability Corporation (NERC) rules and documented with a NERC e-Tag (e-Tag).¹

There are two processes for submitting e-Tag data for RPS verification of 2008 to 2010 delivery claims. The first process is part of the Interim Tracking System (ITS) and is used only when e-Tags are not available in WREGIS. The retail seller must complete a CEC-RPS-Delivery form to report the data contained on the e-Tag such as the Purchasing Selling Entity (PSE) code, Point of Receipt (POR), Point of Delivery (POD), and the monthly and total annual amounts of energy procured. To verify that data reported on the CEC-RPS-Delivery form is acceptable, staff asked retail sellers to submit a random sample of the e-Tags associated with the energy delivery in support of a particular claim.

The second process for verification utilizes the e-Tag functionality in WREGIS and includes the retail seller's submission of a WREGIS NERC e-Tag Summary Report along with its WREGIS compliance report. This NERC e-Tag Summary Report pulls data from e-Tags that are imported into WREGIS, which contains information used to verify delivery.

In 2008-2010, some retail sellers submitted CEC-RPS-Delivery forms to report energy delivery data, and others used the WREGIS NERC e-Tag Summary Reports. In both cases, staff requested a random sample of e-Tags for each of the out-of-state procurement claims and verified that the e-Tags included the required information and was consistent with the data reported on the CEC-RPS-Delivery forms. Most of the retail sellers submitted the sample e-Tags in the correct format. However, some retail sellers stated they did not have access to the actual e-Tags and instead submitted e-Tag documentation in different formats.

During the workshop, staff will discuss some of the different circumstances in which verification of energy delivery did not meet the *RPS Eligibility Guidebook* requirements.

¹ *RPS Eligibility Guidebook, Third Edition* p.24 and *RPS Eligibility Guidebook, Fourth Edition* p. 38.